

NOV 5 1992

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Mr. Donald J. Wanamaker
Field Services Manager
Lion Technology, Inc.
P. O. Drawer 700
Lafayette, New Jersey 07848

NOV 25 1992

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Dear Mr. Wanamaker:

We have reviewed the closure plan you submitted on behalf of Teccor Electronics, Inc., 1101 Pamela Drive, Euless, Texas. The closure plan addresses disposal of two buried inactive waste chemical tanks.

As indicated in your letter of transmittal, there are no regulations or specific requirements related to final closure of the tanks under the Comprehensive Environmental Response, Liability, and Compensation Act (CERCLA). There are, of course, general requirements that the closure activities do not cause a release of hazardous substances at the site or create a threat to public health or welfare or the environment.

In general, the closure plan submittal seems to adequately address removal of the wastes, removal of the tanks, soil testing, and site restoration. There are a few specific questions and comments, however, which relate to the procedures to be utilized to effect closure.

1. Closure activities must comply with all requirements of the Texas Department of Water Resources (TDWR) and all other applicable local, State, and Federal regulations. As indicated in your transmittal letter, the closure plan has been submitted to TDWR for their review and comment.
2. If it is determined that the wastewater mixture in the tanks is a hazardous waste as defined in 40 CFR Part 261, then the wastewater must be shipped to a disposal facility having Interim Status and appropriate generator I.D. and manifest requirements must be followed.
3. The closure plan states that soil sampling will be conducted underneath the tank area following tank removal. EPA does not have soil standards for the constituents listed in the closure plan, but the proposed action levels listed on page 24 appear reasonable for trichloroethylene, cadmium, and hexavalent chromium. It may be advisable to collect soil samples in other

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areas of the site to obtain "background" levels for nickel since our references indicate a typical value of nickel in soil as approximately 40 ppm.

4. Certification that the closure was accomplished in accordance with the closure plan should be submitted to EPA by both the owner/operator of the site and an independent registered professional engineer.

Approval of the closure plan is based on removal of all wastes, tanks, and contaminated soil from the site to an approved disposal facility in accordance with the plan submitted. If there are any changes in the plan or the closure procedure, EPA should be notified immediately.

If you have any questions related to this matter, please call Mr. Larry Wright at (214) 767-4075.

Sincerely yours,

/s/ William B. Hathaway

William B. Hathaway, Deputy Director
Air and Waste Management Division

cc: Mr. Charles Faulds, Texas
Department of Water Resources

bcc: File - TX 9067
D. Hoenig, 6AW-SO

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